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Kenneth D. Freundlich (SBN119806)
FREUNDLICH LAW
16133 Ventura Blvd. Suite 1270
Encino, CA 91436
P: (818) 3775-3790
F: (310) 275-5351
E-Mail: ken@freundlichlaw.com

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

Attorneys for Defendant COURTNEY LOVE COBAIN

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JESSICA LABRIE, an individual,

Plaintiff,

vs.

COURTNEY LOVE COBAIN,
an individual; and DOES 1 through 25,
inclusive

Defendants.

Case No. CV 12-7793

DECLARATIONS OF COURTNEY
LOVE COBAIN AND KENNETH D.
FREUNDLICH IN SUPPORT OF
NOTICE OF REMOVAL

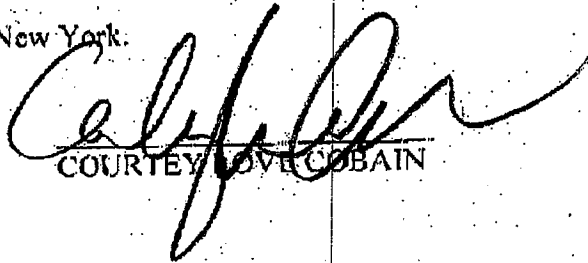
DECLARATION OF COURTNEY LOVE COBAIN

I, Courtney Love Cobain, declare:

1. I am the Defendant in an action brought by Jessica Labrie against me in the Los Angeles Superior Court, *Labrie v. Cobain*, LASC BC 488024. The facts stated herein are true and correct and of my own personal knowledge. If called and sworn as a witness, I could and would testify competently thereto under oath.

2. At all times that Jessica Labrie purports to have performed "services" for me, I have been residing and domiciled in New York City. Indeed, my current address and the address to which this Complaint was served is located in New York City.

Executed on September 10, 2012 in New York.



COURTNEY LOVE COBAIN

DECLARATION OF COURTNEY LOVE COBAIN IN SUPPORT OF NOTICE OF REMOVAL

DECLARATION OF KENNETH D. FREUNDLICH

I, Kenneth D. Freundlich declare:

1. I am an attorney at law duly qualified to practice before this Court and the Courts of the State of California. My firm is Freundlich Law, attorneys of record for Defendant Courtney Love Cobain. The facts stated herein are true and correct and of my own personal knowledge. If called and sworn as a witness, I could and would testify competently thereto under oath.

2. Plaintiff Jessica Labrie ("Labrie") alleges that Love promised her a "full ride" scholarship to Yale University. According to the Yale website, Tuition for Yale is in excess of \$40,000 per year which means that the alleged promise has a value in excess of \$160,000.00. Attached hereto as **Exhibit C** is a true and correct copy of a page from the Yale University website printed out on August 27, 2013 demonstrating the cost of tuition.

3. The Complaint also alleges wages and expenses owed that exceed \$25,000.00 based on the last invoice Labrie provided to Love. Attached hereto as **Exhibit D** is a true and correct copy of the last invoice that Labrie sent to my client alleging unpaid sums in excess of \$27,000.00.

4. The Complaint seeks attorney's fees and punitive damages as to the majority of the counts. Attorney's fees in a case like this are likely to exceed \$50,000 not to mention the punitive damages aspect of Labrie's prayer for relief.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed on September 11, 2012 at Encino, California.



KENNETH D. FREUNDLICH

EXHIBIT C

Y*

Learning at Yale
Living at Yale
Student Pursuits
Virtual Tour, Blogs & Video

Apply

Application Process
Advice to Candidates
Visit & Connect
Financial Aid

Frequently Asked Questions - Financial Aid

[\[expand all\]](#)**Q. What is the current tuition at Yale?**

A. The total Cost of Attendance for attending Yale in 2012-2013 is \$58,600, which includes tuition (\$42,300), room (\$7,150), board (\$5,850), and books and personal expenses (\$3,300). Total cost of attendance (not only tuition) is used to calculate a student's need-based financial aid award. Yale meets 100% of demonstrated need. In recent years, the average Yale Scholarship (a need-based grant) has been \$35,500 for students on financial aid and roughly 57% of Yale students receive need-based financial aid.

Q. On what basis does Yale award financial aid?**Q. How does Yale meet financial need?****Q. What factors are considered in the calculation of expected family contribution?****Q. Do I need to reapply for financial aid each year?****Q. Will my family contribution change in future years?****Q. How do you incorporate noncustodial parent information into the expected family contribution?****Q. Where can I find more information about financial aid at Yale?****Main Pages**

[Freshman Application Process](#)
[International Freshman Applicants](#)
[Standardized Testing](#)
[Interviews](#)
[Single-Choice Early Action](#)
[Financial Aid](#)
[QuestBridge Program](#)
[Transfer Program](#)
[Eli Whitney Students Program](#)
[Non-Degree Students Program](#)
[Alumni Auditing Program](#)
[Yale-NUS College](#)



EXHIBIT D

Total hours worked in 2011 for CLC:

<i>Dec. 26th 2010 to Jan 10th</i>	70 hours
<i>Jan. 11th to Jan. 31st</i>	113 hours
<i>Feb. 1st to Feb. 19th</i>	160 hours
<i>Feb. 19th to March 15th</i>	185 hours
<i>March 16th to April 6th</i>	160 hours
<i>April 7th to May 6th</i>	175 hours
<i>May 7th to June 6th</i>	175 hours
<i>June 7th to June 27th</i>	166 hours
	Total Hours: 1204
	Hours Paid: 603 @ \$30 per hour = \$18,090
	Total Wages Owing: 601 @ \$30 per hour = \$18,030

Expenses:

1. Travel: Jan 2011 Trip to L.A, June 2011 Trip to L.A and NYC.	\$2400 <i>(\$1200 is for roaming charges in L.A in January 2011 + Memory Sticks for Home Sweet Home, \$200 per diem for trip to L.A Jan 2011, and \$1000 per diem for L.A / NYC Trip June 2011.</i>
2. Miscellaneous receipts submitted from L.A / NYC Trip (attached)	\$545.05 <i>**Note: Budget Rental Car originally pre-authorized my credit card for \$300 at time of rental. They've since sent me a statement for car rental and they've removed the charge from my card, as they destroyed my luggage upon arrival in L.A. They said they wouldn't cut a check for the destroyed luggage, and that they'd prefer to give me the car rental complimentary. I've enclosed my receipts for replacement luggage in lieu of the car that was to be covered with the trip.</i>
3. New mobile expenses from June Trip (attached)	\$1528.00
4. Additional roaming charges and international rates for mobile from Jan to June 2011 (attached)	\$3070.00
5. Office Space Rental from January 2011 through June 2011 at \$500 per month.	\$3000.00
6. Additional Personal assistance on research and dropbox per Ms. Love's request, via Vidar Baltzersen (200 hours at \$15 per hour)	\$3000.00
7. Internet and Landline for safe calls	\$600.00
	Total Expenses: \$14143.05

	Total Paid:	\$4400.00
	Total Owing:	\$9743.05

<u>Total Amount Now Due:</u> \$27,773.05
